

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

ANNIE M. PAPA	:	
Plaintiff	:	
vs.	:	NO. 11089 OF 2025, C.A.
MARCO BULISCO Individually et al	:	
Candidate Defendant	:	
New Castle Fire Department (<i>not all</i>)	:	
Thomas Bulisco Assistant Chief	:	

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COMPLAINT IN EQUITY

Plaintiff, by her attorney, files this complaint against Defendants, MARCO BULISCO, New Castle Fire Department, and Thomas Bulisco Assistant Chief, on the grounds that Defendants have caused and continue to cause immediate and irreparable harm to Plaintiff and is entitled to damages as well as equitable relief, including a temporary restraining order and preliminary and permanent injunctions. In support of her Complaint, states the following:

1. Plaintiff, ANNIE M. PAPA, is an adult individual residing at 234 E. Northview Ave., New Castle, Lawrence County Pennsylvania, firefighter for the City of New Castle , hereinafter referred to as aggrieved firefighter.
2. Defendant, MARCO BULISCO is an adult individual residing at 2919 Cornell Ave., New Castle, Lawrence County PA 16101, hereinafter referred to as defendant.
3. Defendant, Thomas Bulisco Assistant Chief is an adult individual residing at 2622 Wilmington Rd., New Castle, Lawrence County PA 2919 hereinafter word referred to as defendant assistant chief.
4. Defendant, New Castle Fire Department is a department of the city of New Castle government and fire department for the city, the principal place of contact at 10 Margaret St., Lawrence County, PA 16101, hereinafter referred to as defendant department.
5. Defendant, and defendant, assistant chief are sued individually and as agents of the fire department.
6. Plaintiff is a Certified Firefighter One and has been employed by the defendant fire department since October, 2024.
7. In violation of city ordinances, standard operating procedures, their union membership, firefighter ethics, state constitution, federal Constitution, both individual

defendants discriminated against the plaintiff because of her gender and her disability and retaliated by masterminding, organizing, recruiting others, making false statements about the plaintiff, designed to shun, isolate, and harass the defendant to the point that she would quit voluntarily.

8. In addition, both individual defendants in violation of all of the above stated, together and recruited others to refuse to train the plaintiff, make false statements, false allegations, and otherwise have her terminated if she did not quit.

9. In addition, both defendants, in violation of all of the above stated, together and recruiting others isolated her and prevented her from doing her job all in the common plan and scheme to make the plaintiff quit or have her terminated on false grounds.

10. In addition, both defendants, in violation of all of the above stated, conspired with others to illegally discriminate, retaliate, harass, or to the point of her quitting, prevent her from doing her job correctly, and otherwise cause for false reasons her to be terminated.

11. Both defendants, including all conspirators, carried on an aggressive, discriminatory campaign and organize activities aimed at preventing the plaintiff from becoming employed and/or remaining employed as a firefighter because of their discrimination against her on the basis of sex, disability, and other personal reasons not associated with the profession.

12. Meanwhile, Defendant department permitted this to continue without convening or disciplining the individual defendants in violation of city ordinance, state and federal law, common law, and standard operating procedures because of the hostility and bias as above described, against her.

13. Plaintiff was the first female firefighter in the 155-year history of the city of New Castle, Pennsylvania.

14. Both individual defendants, organized other members of the defendant department to join in the harassment to the point of physical abuse, designed to make her quit.

15. When they were not successful in making her quit, they organized other members to fabricate stories so that she would be terminated improperly.

16. All individual defendants committed tortious interference with contract by intentionally interfering with Plaintiff contractual relations without privilege to do so.

17. The defendant fire department, with knowledge permitted this to continue to the point it was required, plaintiff to file a complaint under city ordinance harassment rules and procedures.

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14. Defendant department had a formal complaint filed, by the plaintiff in the hopes of saving her job, which created a duty for the department solicitor to investigate and abate a hostile work environment.

15. Instead of properly investigating and preventing, the defendants and the investigator for self-preservation and to avoid sanction for the harassment retaliated and created a fictitious reason for her to be terminated.

16. Although none of the defendants had justifiable cause, they created numerous false narratives, and used them to claim that she could not do the job.

17. All defendants separated her from work for several months, and then concocted an illegal test requiring her to take the test designed to give them reason to terminate her which did not exist.

18. The test was designed to cloak them and hide their illegal harassment in the court of public opinion, provide a reason to terminate her which did not exist, by proffering an illegal test that they were sure they could manipulate to make her look incompetent.

19. All of the above was against the city ordinances, state law, and federal law.

20. All of the above was done and further retaliation against the plaintiff for filing an ADA request and hostile environment complaint.

21. Even when the ADA request was granted all of the above, defendants refused to implement for reasons which include but are not limited to repairing her relationship with some of the firefighters and saving her job.

22. The unlawful activities of Defendants have consisted of, among other things; singling her out, fabricating false accusations against her, shunning, refusing to train her, refusing to help her, attempting to change the probation to more easily terminate her, physically abuse her, isolate her, attack her reputation.

23. All of the above, defendants not only separated her from her job with the assistance of the nonenforcement and nonapplication of her ADA, but also in order to protect them from being discovered and discipline if not terminated, fabricated and excuse that she was incompetent.

24. By requiring her to take a test that was designed to give them excuse to terminate her (something they otherwise did not have), it was a trap she could not escape.

25. She clearly could not pass the test by the polluted design including without limit: being kept away from work for over year and ½, and only being given 90 days to train with no equipment or no access to the fire department; not providing any options on pass fail or guidance on what score would be required; numerous subjective sections of the test which could easily be manipulated by designing people like themselves; requiring her

to do things she had already proven able to do; refusing to extend the time for her to prepare to take the test; etc.

26. Although the defendant had properly filed an ADA request, and a proper harassment complaint, none of those were investigated by the conspiring agents of the defendants responsible for doing the same.

27. The plaintiff endured for several months, not wanting to ruin the chances of creating and/or rehabilitating her relationship with the fire department.

28. After the fire department separated her, they constantly assured that they were working on the situation internally.

29. Agents of the fire department promised to handle it appropriately internally so that she need not seek her legal rights.

30. With only 13 days' notice, he became aware of the set-up test.

31. Immediately realizing the fraud that was being perpetrated, she filed a claim with the EEOC.

32. The defendants plan on arguing against and therefore preventing her from suing while EEOC investigates, conspiring to prevent her from getting any help from the court until it is too late.

33. The plaintiff termination would cast a mark on her career and significantly impede further pursuits.

34. Without a court order of injunction, the plaintiff will suffer permanent, substantial, irreparable harm without adequate remedy at law, by the time EEOC could give her a right to sue or effectuate another remedy.

35. The plaintiff's claim for relief is only temporary, while EEOC attempts to remedy the situation.

36. The defendants had placed her unpaid leave with benefits and would not be prejudiced because she has been on that status for over a year.

37. When a court of law has the time to examine the test, it will clearly be ruled illegal and irrelevant.

38. By the time the court would get to this all of the damage would be done, and irreparable.

39. The plaintiff has significant amounts of evidence and will clearly prevail on her claims.

40. Without a restraining order, the plaintiff cannot hope to adequately protect Plaintiff's rights or otherwise protect Plaintiff against the unlawful actions of all Defendants.

41. Plaintiff will suffer further and has suffered and continues to suffer significant and irreparable losses as a result.

52. The defendant's actions and inactions are preventing EEOC from doing its designed purpose.

53. The plaintiff's request in the instant equitable request is significantly different and separate from the legal claim for damages which will be and is the subject of the EEOC.

54. Defendants' encouragement, authorization, leadership and involvement in the above activities are unlawful.

- o (a) City ordinance describes singling out as harassment itself and all defendants are thus harassing the plaintiff by making her take this test.

55. Defendants' illegal activities will continue to cause significant and irreparable harm to Plaintiff as described above, for which monetary damages will be inadequate and cannot now be definitely ascertained, unless they are restrained by this court.

56. Plaintiff has no adequate non-statutory remedy at law.

57. As to each item of relief requested below, greater injury will be inflicted upon Plaintiff by denying relief than will be inflicted upon Defendants by the granting of such relief.

58. This court has jurisdiction over this action by virtue of 42 Pa. Cons. Stat. Ann. § 931 and its traditional equity powers.

59. No item of relief sought below is prohibited by Section 206(f) of the Pennsylvania Anti-Injunction Act of 1937, Pub. L. No. 1198, Section 6, 43 Pa. Cons. Stat. Ann. § 206(f).

60. Plaintiff has complied with all obligations imposed by law and has made every reasonable effort to settle this dispute with Defendants.

61. A prompt resolution of the dispute is required to assure the preservation of the safety interests of the plaintiff, the defendants, other firefighters, and the city at large.

62. The defendant department, with a desire to shield themselves from discovery, on their inability to control the fire department and the various defendants, have chosen to join the conspiracy, to fabricate a reason for the plaintiff to be terminated.

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63. The defendant department has no justification for terminating her, and that's why they are forcing her to take a sham of the test.

64. Even Plaintiff does would pass the test, she would be forced to immediately report back to work where the hostile work environment was not even properly investigated, much less cured, opening the gates for the harassment to continue.

65. The harassment had actually reached physical proportions, and exposing her to danger on the job.

66. All defendants, have no fear of the current remedies, and in fact welcome the cover pending litigation, and the expiration of several months.

67. All defendants are counting on, plaintiff not being able to sue, until EEOC investigates and tries to cure the problem.

68. The solicitor himself in the last motion court, indicated to plaintiff's counsel that the relationship is not salvageable.

69. The suggested test is itself and illegal harassment according to city ordinance.

70. Any attempt to take the plaintiff's job is a violation of numerous parts of the ordinance as she has already passed probation as certified by the chief.

71. Without injunctive relief, maintaining the status quo, the EEOC would be prevented from doing its job, and depriving the plaintiff of her employment, benefits which are necessary for health problems caused by all of this, and compensation.

72. The defendantS put her on leave, maintain her benefits, maintain her paycheck, and prevented her from working, and did not cure the harassment environment, causing her significant health problems.

73. The plaintiff is seeking a stay of the status quo, only pending a hearing, or an expedited hearing on the emergency relief.

74. The emergency relief is significantly different and apart from any relief requested at EEOC.

75. In an expedited hearing, the plaintiff can clearly demonstrate the legality of granting status quo relief.

76. There are numerous details in this case can't be explained or proven without at least hearing.

WHEREFORE, Plaintiff respectfully requests that this court:

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1. Issue immediately a temporary restraining order in the form attached and after hearing, issue a preliminary injunction as provided under Pennsylvania Rule of Civil Procedure 1531;
2. After a full hearing, award to Plaintiff money damages which it has suffered as a result of the Defendants' unlawful activities; and
3. Grant Plaintiff such other relief as it may deem appropriate, including but not limited to reasonable attorneys' fees and costs.

Respectfully Submitted

Angele A. Papa Esq.



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ANNIE PAPA TIME LIME COURT AID 10/14/25 1:48 PM

PARENTS/FRIENDS DIARY/RECORD OF ANECDOTAL FACTS AND EVENTS AP 7:48

Summary of Relevant Facts:

PERSONAL BACKGROUND FAMILY DIARY :

1. From a tender age of seven or younger, the Plaintiff harbored unwavering aspirations of pursuing a professional career as a firefighter.
2. The authorship of legal documentation seldom affords such intimate insight into the client's persona.
3. While acknowledging both the merits and demerits inherent in my paternal relationship with the plaintiff, it availed me the opportunity to scrutinize the underlying rationale expounded in the preceding paragraph.
4. Manifested through numerous dialogues and observations, the plaintiff consciously elected to pursue this vocation primarily to contribute to her community by engaging in the noble act of preserving lives, a unique facet not readily afforded by other vocations, and to collaborate with a cohesive cohort of

altruistic, steadfast, and dedicated colleagues in furtherance of the
aforementioned objective.

5. Despite persistent parental nudges towards a career in medicine, the plaintiff steadfastly espoused her preference for the firefighting profession, notwithstanding possessing the requisite intellectual acumen.
6. Gainful employment is a requisite for all individuals, and the plaintiff unequivocally identified firefighting as her desired occupation, motivated by the aforementioned considerations.
7. As elucidated subsequently in this instrument, securing employment in this field is arduous.
8. Prospective candidates must await city solicitations for employment opportunities, undertake rigorous physical conditioning to complete a demanding obstacle course encompassing a mile and a half run, navigate a competitive examination process, wherein veterans enjoy a ten-point advantage, and ultimately remain subject to the discretionary decisions of the governing authority REGARDING HIRING.

**I. (FIRST) ATTEMPT TO STOP ANY FEMALE FIREFIGHTER - ABUSING THE
SYSTEM PREVENTED BY RECOURSE TO CIVIL SERVICE BOARD**

9. The city ordinances, common law, state and federal constitutions, civil service law, American with Disabilities Act, guarantees of non-discrimination, and our own ordinances found in the SOP:

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Section 6.13 justifiably refer to acquisition of this position as “*Civil Service employees and employees who by statute have a protected interest in their jobs...*”;

8. In the event an individual demonstrates unwavering commitment by assuming multiple risks and temporarily postponing personal pursuits to secure a coveted "protected interest job," any actions impeding, obstructing, or withdrawing support for such employment should not be undertaken lightly, absent substantiated and documented justifications.
9. The prevailing ordinances and **Standard Operating Procedures** (CREATED BY ORDINANCE AND EFFECT OF LAW (SOP) mandate daily training sessions, ensuring that each incumbent of a protected interest position is afforded ample opportunity to perform their duties competently.
10. Numerous provisions within the municipal ordinances and administrative code emphasize the necessity of ***close supervision by superiors*** during the probationary phase, aimed at providing guidance, rectification, and fostering the growth of proficient employees.
11. The ordinance itself indicates the following further mandatory precautions:
164.02 CIVIL SERVICE BOARD (oversight)
(u) Probationary Period.
(1) Every successful applicant for the position of firefighter shall serve... Probationary period. For newly hired firefighters, the probationary period will begin on the first day the new officer reports to work. During this probationary period, a newly hired firefighter may be dismissed for cause for reasons set forth... A probationary firefighter may be dismissed, if the probationary firefighter does not meet the required expectations. All of the position and documentation is accurately documented.
(2) during the probationary period, the Fire Chief shall monitor and review the progress of the probationer in order to further determine their probationer's qualifications for permanent employee and the Fire Chief shall report to the Mayor and Council regarding the performance and conduct of the probationer at least once during each consecutive (3) month period of the probationary employment.
(3) the Fire Chief shall submit to the Mayor... Each report shall be submitted in writing to City Council..."

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12. At the onset the ordinance itself in multiple places, talks about the scrutiny, and the importance of supervisor performance reviews, so that a probationer if not performing correctly can be fairly corrected, shown how to do it right, and then given an adequate opportunity to demonstrate his now "learned" competence.
13. In this particular case, the plaintiff has never received a negative report, plaintiff, or correction opportunity.
14. To claim that she is not qualified in any way would not be true, and certainly not fair.
15. Although many children begin that way and abandon such a desire, especially a female, she never did, and in fact ended a very promising college career to be a doctor in preference when she joined the Neshannock Volunteer Fire Department.
16. The plaintiff, although very physically fit and in the top of her collegiate class is disabled with Asperger's, and a combination of OCD which, although making her brilliant, she is different, and sometimes socially awkward.
17. But she can do this job, and literally was born to this calling.
18. This has caused her to be somewhat socially backward at times, and she has an enviable work ethic/passion that's never been criticized.
19. Plaintiff had an opportunity to be tested for the New Castle professional fire department presented herself, and after a long period of grueling training and studying, she showed up for the physical and mental tests in fall of 2021. **(SEE EX A)**

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20. Notwithstanding, the fact that she passed the grueling physical test and was immediately ushered into a classroom, she took the written test with the six or seven other candidates.

21. At the end of the time allotted to answer the questions, even though she had finished in plenty of time, she used all of her time to double check her answers because it was that important to her. **(October 30th, 2021)**

22. **Within minutes of time expiring on one last review she noticed 50 (more) questions not with the rest. When she approached the Proctor, he agreed that even if unbeknownst to her, there was a blank page separating 50 other questions, he still refused to give her time to do those questions because time had expired.**

23. Plaintiff was forced to file an action **(November 3, 2021)** with the local civil service board and have a formal hearing **(December 13, this 2021)** and the official **Civil Service Board in the City of New Castle** IMMEDIATELY ruled in her favor, and her and at least three others who were deceived by the faulty written test were permitted to take a retest.

24. Four of the six applicants made the same mistake because of the defective booklet, and effective monitoring of the defective Proctor.

25. It should be noted that although we do not have any evidence of any wrongdoing at that point her and the others who fell to that defective test would have never had another chance, had it not been for her filing an official complaint with the New Castle Civil Service Board.

DELAY

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26. It should also be noted that, notwithstanding that decision taking place in December 13, 2021, it was not until **May 2022, (5 FULL MONTHS LATER)** that the ordered retest from December was finally conducted.
27. After the interview, which took place immediately after the written retest Plaintiff was interviewed as part of the process,
28. Petitioner was told that she would hear something in the very near future.
29. She eventually passed the physical and the mental test and was placed on the eligibility list.
30. Parenthetically, a friend/family professional marathon runner who helped train her happened to be in City Hall within days of her interview and was informed by the Fire Chief that she did very well in the interview.
31. Plaintiff and parents kept searching the papers, the mail, and various City Council agenda, looking for news but heard nothing: June, July, August, September, October, November, December, 2022. **(214 days)**
32. After, Petitioner had heard rumors that she did well on the test and that there were two or three positions, and even though it was, and still is, required by law she and all other persons on the list immediately receive notice of their result, the law was violated and she had to demand the Civil Service Board intervene again to get her result.
33. She never did get to see her results to this day and (in violation of law) she never saw "the list" until January 30, 2023 **(now 244 days). (SEE Ex B)**

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34. Parenthetically, although a copy of the list is attached as exhibit, it does not identify the date it was created, which creates a significant opportunity for manipulation.

35. The best guess is that the list was created sometime in November 2023.

36. **In light of all of the circumstances, it is not unreasonable to believe that had she not contested or demanded her results an attempt could have been made to claim that the list had expired, especially in light of the fact that the list is not dated.**

37. From then on when the plaintiff would inquire (which was at least monthly for obvious reasons) no one knew anything.

38. No news in February 2023, March, April, May, June, July, August, September, **(242 more days, total to date, 456 days or 1 year and 84 days, SINCE THE BOARD HAD TO ORDER THE CITY ADMINISTRATION TO RETEST)**

39. Parenthetically, as will appear more important later, the clock was running on how long the civil service test results with last before they would expire prior to anyone being hired.

In Pennsylvania, civil service eligibility lists are generally valid for one year from the date the list is formally adopted. This period can be extended by the Civil Service Commission for up to an additional 12 months with a majority vote.

- **Initial validity:** The list is valid for one year from the date it is formally adopted.
- **Potential extension:** Before the initial year expires, the commission can extend the list's validity for another 12 months.
- **Expiration:** The list expires if the commission does not vote to extend it.

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40. Although the City had an immediate need, it was discovered later that two members, (hereinafter referred to as Marco, Thomas, or the Buliscos) at least of the fire department were **manipulating the civil service system, the city government, and various other machinations** to prevent the plaintiff, or any female from ever being officially hired because of her sex, disability, and other illegal reasons.
41. Plaintiff, through counsel had to politely suggest that she was going to attempt to extend the time because they had not “formally adopted the list which did not contain a date, therefore the one year clock did not begin to run, which they likely (incorrectly) calculated to be November 2023.
42. Prior to hearing anything back from that threat **(to go back to the Civil Service Board for additional relief, again)** literally out of nowhere the plaintiff was called and ordered to go to a City Council meeting to be hired.
43. At the public meeting and after an unsuccessful attempt by the above described “gentlemen” to run the clock out on the eligibility list, which list the plaintiff had a **legal interest** in, and was occupying, the city government legally hired the plaintiff to full-time firefighter position.
44. Tom Bulisco, assistant chief who attended the December 13, 2021 meeting to protest her getting a retest, also appeared, (a scene right out of Godfather II in a poor attempt to imitate VINCENZO PENTANGELI scowling his brother Frank) herein, at council members and obviously attempting to intimidate at least three of them to vote against her.

45. Two council members voted against her, claiming that they had nothing against her, but they would like to have a new list.

46. This clearly indicates what their ulterior motive was.

FIRST ATTEMPT FAILED

47. The next attempt will be one they have used in the past and old reliable-harass to the point of making the new firefighter quit;

48. They were successful in making the firefighter hired with her quit.

49. They were always against him because of his age, and likely because they had other people in mind for the job, (possibly friends, political favors, or financial interests.)

50. It is no secret that they regularly use and abuse the power structure of the department.

51. Currently in the home rule form of government (where the former mayor who appointed the management of the fire department) chose to “cash in” and become a higher paid city administrator, because he serves “at the will of council” its very likely that Buliscos have significant influence there.

52. It appears customary for the day-to-day management of the firefighters to be delegated or materially deferred to assistant chief Thomas Belisco.

53. The chief, the now employed at will city administrator, and the assistant chief need to maintain a ship that doesn't rock.

54. Marco Bulisco, son of Assistant chief Thomas, as one of the other power sources has huge power and control of all the firefighters because he is the president of the local union.

55. He has been heard to threaten (not) to properly file a proper grievance unless one of those grieyed knuckles under to his requests.

II. (SECOND) ATTEMPT TO STOP 1ST and/or ANY FEMALE FIREFIGHTER:

- **TWO FULL YEARS AFTER SHE TOOK AND PASSED THE CIVIL SERVICE TEST SHE STARTED HER FIRST DAY**
- **ONLY 12 DAYS LATER ASSISTANT CHIEF BULISCO AND HIS SON ORGANIZE A SABOTAGE BY TEXT TO THE WHOLE DEPARTMENT**

56. **Saturday November 11 8:21 AM** Marco Bulisco masterminds, begins organizes, motivates, illegally directs, and facilitates, what will be an almost 2 year campaign to get the plaintiff to quit or get terminated by other efforts including without limit:

- a. Distributing an email from his father, days within the time his father certified her as ready for a crew and passing field training, designed to sabotage her and seriously compromise her safety. **(SEE EX C)**
- b. Fabricating a ruse claiming that she accused him of stealing union money. This was necessary because she did make at least a few friends who admired her work ethic and her passion.
- c. Attempting to change the probation rules illegally.
- d. Screaming at her and humiliating her, promising her that she would be shunned by everyone, now and in the future.

- e. Leading her to believe she was going to be accepted into the union, having her appear in front of the entire assembly, announcing to their pleasure, that she was unanimously rejected, and then ordering her to leave the room.
- f. Threatening a lieutenant from Sharon who had been helping her, with running over, he and his two toddler twins with a fire truck, and never disciplined for it.
- g. Sabotaging the same firefighter's equipment, and never disciplined or investigated for that either.
- h. When none of that worked either, he organized a conspiracy of lies concerning fabricated and immaterial claims that she couldn't do the job and that she is not qualified, when he himself is not as qualified as she is.
- i. Using his power to prevent the solicitor from properly investigating the plaintiff's harassment complaint and not following the law.
- j. He likely had a role in the city administrator and solicitor decision to violate their harassment policy by setting her up and singling her out for a test that no one could pass and no one ever had to take before so that they would have an excuse to terminate her.

57. Plaintiff has direct evidence of all of the above, including without limit expert and sworn fact testimony by a professional expert firefighter as to the text and facts and **complete lack of materiality to any complaints against her being able to do the job.**

58. **She has been prevented from going back to work or back to the station at all for any reason, for over a year and one half, until and only if she takes and successfully passes a test. No other firefighter has ever had to do this.**

59. At the onset, it must be noted that the plaintiff is **and has been for a significant period of time, a non-probationary employee, permanent employee** and entitled to member benefits of the collective bargaining unit, because she should have been and therefore is a part of the collective bargaining unit as of her 90th day, (and/or her six-month, one year, period, all of which are now expired.

60. This is especially true and valid when combined with her request for written formalization of her membership, which request was suggested to be done by the National Union Vice President, and when evaluated in combination with New Castle City Administrative Code, Article 161 - Personnel System

161.09 PROBATION

(a) **Employees appointed from original appointment eligibility list... shall be subject to a period of probation, as set forth in the civil service rules and regulations and in accordance with the existing collective bargaining unit.**
(Ord.8423. Passed 11-10-2022)

(b) **The regular period of probation shall be (6) months, provided that the personnel rules and labor agreements may specify a... shorter period of probation...or for extension of the probation period in individual cases. No probationary may extend beyond twelve (12) months.** (Ord.8423. Passed 11-10-2022)

(c) The work and conduct of probationary employees shall be subject to close scrutiny and evaluation...

(d) An employee shall be retained beyond the end of the probationary period and granted permanent status only if the *department director affirms* that the services of the employee have been *found to be satisfactory* and recommends that the employee be given permanent status. (Chief Kobbe 4/16/24)

164.04 Probationary Period (8456 Adopted 12/19/230 CB 2023-27)

(5) At the end of the... probationary period, if the probationer is not notified or dismissed *in accordance with this section*, a newly hired firefighter shall receive permanent status within the fire department.

61. It is crucial, from the outset, to emphasize and clearly comprehend that the plaintiff and her family have consistently harbored no intent other than helping their daughter to diligently discharge her duties as a city firefighter within the City of New Castle, and fit in.
62. The unwavering commitment of the plaintiff and her family has perpetually centered on fostering an environment within the fire department conducive to her integration as a cherished member of the fraternity.
63. Extensive deliberations within the family unit have underscored the unequivocal resolve not to impede the plaintiff's professional trajectory in any capacity.
64. She has been duly admonished to embrace a role marked by courtesy, deference, enthusiasm, loyalty, and a renowned work ethic, even in the face of challenges.
65. At no juncture, including the present, has the plaintiff harbored any inclination to raise informal or formal grievances or contestations.
66. Through great restraint, the plaintiff was (now 10/13/25) compelled to bring the present matter before the Court of Common Pleas.

67. Under the tutelage of Assistant Chief Thomas Bullisco, the plaintiff underwent field training, culminating in a positive evaluation affirming her readiness to assume duties on a designated shift.

68. Personally certified to the chief with her in the office with both of them that she was ready and had passed field training.

69. It is noteworthy, albeit parenthetically, that subsequent to this training, the plaintiff has not received ***any further formal instruction***, in contravention of established protocols and municipal regulations.

70. Parenthetically, notwithstanding successful completion of a course approved by the chief, taken in in Pittsburgh, the plaintiff's efforts to secure additional training were met with silence.

71. Parenthetically, during said disciplinary proceeding, despite availing herself of the assistance of one of the aforementioned individuals as a union representative, the plaintiff received no support and was subject to reproach.

72. Parenthetically, any plaintiff's purported violation of procedural norms during the pursuit of additional training is unfounded, given her adherence to directives and absence of prior admonitions.

73. In one of their last moves, they will attempt to claim she can't do the job and as analyzed by an expert firefighter in the sworn statement, and her responses, their allegations prove to be completely without merit. They prove to be completely without merit. **(SEE EXP and N)**

74. Upon resumption of duties, the plaintiff integrated seamlessly within her assigned crew, garnering commendation from her superiors.

75. Subsequent informal feedback has consistently attested to the plaintiff's commendable performance, ranging from "good" to "wonderful," with the chief himself purportedly lauding her accomplishments.
76. The city administrator, in a jesting manner, relayed to the plaintiff's father an anecdote highlighting her unwavering dedication to duty.
77. Descriptions of the plaintiff's demeanor, notwithstanding her disabilities, paint a picture of consistent enthusiasm and satisfaction with her role.
78. Her familial interactions affirm her genuine affection for her profession.
79. Despite repeated requests, the plaintiff was not provided with Standard Operating Procedures (SOP) until **April 2, 2024**, and no additional information or training beyond what has been previously discussed has been offered since her field training.
80. Parenthetically (**see full transcript of a Lieutenant in the Sharon Fire Department**) **very credentialed expert who indicates:**
1. He had been and continue to be advocating a training manual for all firefighters like the one they have in Sharon, and even offered to create one for the department, but it was never accepted.
 2. He received a (the infamous text) text (**SEE EXHIBIT C**) within days of her being hired. The text is from Marco Belisco directed by his father. Assistant Chief Thomas Belasco, to sabotage her by documenting everything she does wrong.

3. He felt sorry for her and was attempting to train her and indicates she did a good job.
4. He indicates she can do the job in many instances better than some veterans.
5. He indicates she was never corrected by anyone or helped most often unless by him.

81. This text alone is *conclusive proof of a serious ethical violation* that should cause the dismissal of both firefighters as well as anyone else involved after **proper and full investigation.**

82. **Eventually, after a year and ½, the solicitor will reveal for the first time that he didn't conduct a legal investigation on this harassment, in motion court on October 6, 2025**

83. **He will also reveal at that same date that the relationship with the plaintiff and the firefighters cannot be salvaged, at the same time he is advocating that she take a test. He test is obviously not designed to help bu destroy her career.**

84. **In that light, there could be no purpose for that test than to bolster a claim to terminate her.**

85. Parenthetically, after filing a formal complaint consistent with standard operating procedures (**SEE EX D**), not only did the city solicitor violate the law by not recusing himself, appointing a special counsel, properly investigating, promptly curing the polluted environment, writing a report with findings and giving it to department head, he indefinitely extended for over a year any

report which not only permanently prevented curing the hostile environment, but concluded all of it by having the city administrator order the plaintiff to be singled out and take a special test with only nine days notice, and no equipment to cover the numerous infractions.

86. The text circulated by Marco at the orders of his father clearly demonstrates how long this evil, illegal conspiracy existed.

87. The contents of **Exhibit C** give rise to inescapable and reasonable inferences, which warrant thorough consideration:

a. It appears that this text message was either improperly directed by the assistant chief to his son, or alternatively, fabricated by the son with the false assertion that it was ordered by his father for extensive distribution and publication.

b. The assistant chief responsible for her training evidently neglected her developmental needs or deliberately subverted the training process. Instead, he purportedly devised a scheme to exploit any perceived weaknesses of the plaintiff, discredit her, impede her learning, obstruct her union membership, and ultimately fabricate probationary violations to facilitate her dismissal.

c. It is pertinent to note that the assistant chief, who orchestrated the dissemination and implementation of this strategy over the course of months and years, conspicuously appeared at multiple prior City Council proceedings to advocate against the hiring of a female firefighter based on gender and/or disability.

d. His actions appear to be aimed at undermining the legitimacy of her recent legal appointment to the fire department.

e. Evidently, his objective is to circumvent the legal hurdles he encountered prior to her hiring by exploiting the probationary and union processes.

Prior when the Current Mayor was running for office< Tom Bulisco ordered him not to hire her.

f. His overarching aim appears to be frustrating her lawful employment and subsequently abusing probationary and union mechanisms to fulfill his pledge of excluding females from the fire department, ostensibly to evade potential gender discrimination lawsuits.

g. The text message, originating on **November 11 at 8 AM**, coincided closely with the conclusion of what the plaintiff believed to be a successful field training period conducted by an individual she trusted and viewed as a conscientious instructor.

h. The plaintiff contends, based on her belief, that this nefarious scheme involves multiple participants, with further investigation likely to unveil at least two additional conspirators.

i. Additionally, there is no evident authority for the firefighter who circulated this sabotage strategy, identified as (MB), as he holds no rank within the department.

j. The audible altercation, where discussions were conducted at a volume audible to rank and file members, constitutes a flagrant violation of several City Administrative Code rules, common law, and statutory provisions.

k. The strategy outlined in the text message even goes so far as to encourage unnecessary gearing up in response to false alarms, contrary to standard operating procedures aimed at conserving resources for genuine emergencies.

l. Such actions represent a further breach of standard operating procedures.

m. Both the son and the father, however, appear intent on increasing instances of gearing up to create opportunities for documenting perceived shortcomings in the plaintiff's performance, potentially motivated by ulterior motives.

SECOND ATTEMPT FAILED IN THAT THE HAD NO REASONS & SHE DID NOT QUIT:

88. This failed for several reasons:

89. As will be seen at the end of this document, a vicious and illegal attempt to fabricate claims that she couldn't do the job which ***everyone knew were immaterial as well as not true, none of them were documented by the orders in this text.***

90. If she were unable to do the job, this text would have had all kinds of responses throughout the last year, which did not take place.

91. The next reason it did not work, is because a professional firefighter immediately challenged Marco indicating that he was not going to participate in something this vicious.
92. Ever since then he has had a scarlet A on his back and has never worked for New Castle again.
93. When the text scam did not work, the goal was to continue to isolate and harass her.
94. It is anticipated that someone must've felt sorry for her stuck up for her which caused Thomas Bulisco to get into a heated argument with the person sticking up for her as follows:

Although not privy to the entirety of the conversation, the plaintiff recalls the **assistant chief making remarks**, paraphrased to the best of her recollection, indicating:

- (1) His purported significant influence regarding her potential union membership or permanent employment status.
- (2) A preconceived, **adverse disposition towards her, with a predetermined "NO" vote on her union membership or retention**, without due consideration.

95. At about the time of the 90 day mark, plaintiff father was concerned on rumors he had heard and he and his wife met with the mayor.
96. The mayor relayed and conveyed to the plaintiff's parents, the Chief's contentment with the plaintiff's performance, with **the chief even affirming that she had integrated effectively into the department, characterizing**

her as "one of us," and attributing any perceived issues to undue exaggeration.

97. Notably, neither the plaintiff nor her family harbored further concerns regarding these matters at that juncture, instead **eagerly anticipating the completion of her probationary period** any day, and her subsequent induction into the union.

98. Assurances were provided that she would indeed be inducted into the union.

99. Furthermore, on multiple occasions, the chief explicitly assured that she would achieve union membership within 90 days.

100. It is crucial to reiterate that **during this period, the plaintiff remained content with her interactions with the chief, her crew, fellow firefighters, and her overall progress on a daily basis.**

PROBATION ENDING

101. Meanwhile, the *plaintiff's parents were satisfied* that the revelation brought to the mayor's attention on January 24, 2024, was sufficient to safeguard her legal rights under the Americans with Disabilities Act and to address any evident discriminatory motivations, thereby safeguarding her employment.

102. It should be noted that although plaintiff informed the chief of her disability, she has always been basically a brilliant college student, superior physical strength and courage, and the only issue with the disability, is somewhat awkward, social skills, especially in a male only environment.

103. No one ever doubted that she could do the job as well as anybody, but wanted to make sure that they understood some of her personality quirks so that she could better fit in.

104. At all times, everyone was urged by the people involved, including the chief, that she is one of us, and she will be likely getting union papers.

105. The consensus reached was that the probationary firefighter had seamlessly integrated into the department, with sentiments expressed that the situation had been blown out of proportion and that she was performing admirably.

106. Furthermore, the chief reportedly underscored, in his report to the City Council via the mayor, that the probationary firefighter had garnered full acceptance from her crew, who spoke highly of her performance, there were no negatives.

This report is required by city ordinance and statute (SEE EX E)

107. February 3, 2024, marked her return to work, coinciding with approximately **her 93rd** day as the first female full-time probationary city firefighter.

108. As previously mentioned, through various channels over the preceding 90 days, including informal conversations with officers and/or the chief, the plaintiff was **apprised that she would be eligible for union membership** after completing a 90-day probationary period.

109. On **February 6, 2024**, upon her return to work, a notice was posted stating that the union committee had, or wanted to extended and doubled the probationary period **from 90 days to 180 days**.

It should be noted, drawing upon her father's political experience in the city that there has always been a great deal of manipulation, including allegations of people selling jobs, or at the very least offering significant favors in exchange for getting jobs.

The firefighter jobs require no particular education, and people like the part-time work, so that they can work more than one job or have significant breaks. In essence, they are valuable.

It is his observation that two forms of manipulation occur at various times and in various ways as follows:

- a. No one can be hired until and only if there is a job, and it is advertised with a civil service component for objective testing.
- b. Next once they are advertised, the hopeful applicant must pass a physical and mental test, which is administered and monitored by the local civil service board and strict compliance with law, including without limit: minimum passing score, plenty of advance notice, and notice of what will be tested, with a professional Proctor, and a myriad of safeguards on scoring handling and ranking the applicant's.
- c. It should be further noted that two years before plaintiff ever took the civil service test, she had been approved through Westminster College, and sitting Mayor Anthony Mastrangelo, and the chief for her to do an

internship and get credits for grades in college. Later the chief changed his mind because of the same resistance. There is a great deal of time and effort put into that with plenty of professional input.

- d. Although it was approved by the mayor with the Fire Chief, at least two years later the Fire Chief in question indicated that Tom Belisco was against her.
- e. People in the know, on the above procedures can manipulate the result by eliminating people they don't want, or setting up people they do want.
- f. The plaintiff obviously fell into one of those categories, and maybe both of them, by taking or threatening to take a job from someone they wanted for whatever sordid reason.
- g. One of the ways of manipulation, is to never present any names from the list of the civil service test, and let the list run out and start all over.
- h. The plaintiff was one of two people on the list and eligible, and literally engage legal action before she was sent before the board to be voted on.
- i. They obviously exhausted that manipulation strategy.
- j. On the evening plaintiff was voted in, Tom Bulisco appeared at the Council meeting and, it is respectfully suggested, was attempting to intimidate one or more of the votes to vote against her. She eventually made it on a vote of 3-2, a right to know request is in existence to secure the minutes of the various caucus meetings proceeding that vote but are not yet available.

k. The next manipulation comes after a person makes it through that gauntlet, by making it so unpleasant for them, they quit or if they don't quit setting them up to be terminated before probation.

110. It was further observed that at the union meeting only a select few individuals would be eligible to vote at the conclusion of this additional three-month period, and the committee, spearheaded by the assistant chief and his associates, would oversee the process.

111. It is suggested that voting people in or out of the union is not a standard feature.

112. The president of the national Union indicated that they are always looking for more members, especially female members.

113. These individuals, with their evident bias and prejudgment, are likely to employ any means at their disposal to obstruct her continued employment as the first female city firefighter, irrespective of her successful completion of the probationary period.

114. **It is respectfully submitted that there is no record of any firefighter failing to pass probation in the department's history.**

115. Unbeknownst to the plaintiff or her father at the time, the plaintiff's mother conducted an investigation with the national union and discovered that the National Association of Firefighters Union imposes no probationary period. She was perturbed by any attempts to hinder the acceptance of a new firefighter and collection of dues.

116. While our ordinance permits the collective bargaining unit contract to abbreviate the ordinance's time period by one year, it takes precedence in defining the criteria for determining successful versus unsuccessful new employees.
117. The consensus among everyone the plaintiff has spoken to, including the chief, was that the probationary period is 90 days, a milestone the plaintiff had already surpassed by a week at that point.
118. Subsequently, the aforementioned notice, indicating a 180-day probationary period, inexplicably disappeared from view.
119. As of that date, the plaintiff still had not received a pager, and despite leaving her phone on continuously to ensure she would not miss any general calls while off duty, she was not notified of a general alarm fire on February 28, 2024, due to a glitch in the system.
120. Upon bringing this issue to the attention of the chief, he acknowledged and believed her account, noting that new hires also had not yet received pagers.
121. Notably, despite being reprimanded during a disciplinary meeting for texting, the son of the assistant chief had recently texted one of the new hires about a general alarm fire.
122. On Thursday, **February 22, 2024**, new recruits were hired from the latest six-week list. Parenthetically, it is likely that the budget can't support the new hires and the plaintiff, thus they obviously thought she would quit by then.

123. Throughout this period, the plaintiff had been consistently informed, informally, that the probationary period was 90 days, a milestone she had surpassed by at least 30 days.
124. As indicated at about that time, a document posted on the bulletin board asserted that the probationary period was 180 days, sparking casual discussions. However, this document has since vanished. **(See Ex F)**
125. As customary, upon concluding her shift, the plaintiff habitually bids farewell to her colleagues in the eating area, yet receives no response from those associated with the assistant chief.
126. Other firefighters have expressed disdain for this gesture, indicating a lack of belief in her ability to receive a fair vote from union members tasked with deciding on her probation and union acceptance.

FACEBOOK – MARKO BULISCO

127. Immediately following the hiring of new recruits on February 22, 2024, the union's Facebook page was updated, indicating:

"Congratulations to Josh Riley on his promotion to Assistant Fire Chief and to our probationary firefighters, George Getway, Christopher Lee, and Jamie Mcvicker for joining the ranks!"

128. There are several argument points from this as follows:
- A. The new recruits, having not yet commenced their duties or undergone field training, were promptly congratulated by the union for "joining the ranks," implying that the union's voting process is unrelated to merit or probationary matters.

B. This disparity in treatment suggests a bias against the plaintiff, as her hiring did not receive similar acknowledgment on the Facebook page compared to the male recruits.

C. Furthermore, the Facebook posts featuring the assistant chief's and the new hires omitted any mention or photograph of the plaintiff upon her hiring, with only her family and friends present at the meeting.

D. The absence of the chief, attributed to illness, further underscores the discrepancy in treatment, as no photograph exists depicting the chief alongside the plaintiff, unlike other new hires.

E. The plaintiff was never formally welcomed into the ranks, and the individual responsible for the Facebook posts is none other than the son of the assistant chief in question.

F. It is worth noting that the individuals controlling the Facebook page are also the ones responsible for voting on the plaintiff's acceptance into the union.

G. The plaintiff asserts that inclusion on the Facebook page, like other recruits, would make it difficult for the voting committee to reject her, suggesting that their intention to vote against her candidacy existed from the outset, thus justifying her exclusion.

H. The plaintiff contends that being voted into the union merely signifies acceptance or rejection for moral or other reasons unrelated to job skills, as evidenced by the premature congratulations extended to the new recruits prior to field testing.

I. Additionally, the plaintiff believes it is plausible that certain individuals, in contravention of civil service hiring protocols, sought to circumvent hiring regulations by recruiting and subsequently conspiring to undermine the probationary period, motivated by improper factors such as gender and disability, which they perceive as exploitable vulnerabilities.

ARTICLE 161 - Personnel System

161.07 CLASSIFICATION PLAN

(c) no person shall be appointed to or employed in any position under any class title which has not been approved in the annual budget adopted as prescribed above. (Ord. 8423. Passed 11-10-2022)

129. Plaintiff believes and therefore avers that it's likely the budget cannot support the newly hired firemen without eliminating the only disabled female (her) and that was part of the calculation.
130. Most recently at a restaurant, the former chief approached mother of plaintiff, and apologized for giving her such a hard time, and indicated that it was the assistant chief in question who caused all of the problems in the past, and seemed to also indicate his knowledge of him causing trouble for her now.
- He apologized to us both for the unfortunate events of the past-referring to quashing her doing an internship-and advised that it was not his decision to do that. Later, after he had left our table and was leaving the restaurant, I followed him and point-blank asked him if it was the Bulisco's that were behind Annie's not getting the internship. He nodded his head in the affirmative and said, while raising his hands and shrugging his shoulders, "Well, what can I say?"*

131. **At about that same time, she was congratulated again by the chief as doing a wonderful job, and two Councilmen had indicated she is doing a wonderful job. (SEE EX E)**

132. At about that same time despite asking for SOP (standard operating procedure written instructions), she had been told they don't exist. She finally got them in April 2023, months after she started.

133. She has been able to talk to one of the fellow firefighters and her crew chief or some members of her crew into giving her more instruction, but other than that **no one has attempted to teach her anything**, or in any way tell her she is doing anything substantively wrong.

(Parenthetically, no one at any time ever complained or corrected her or instructed her that she was doing anything wrong either.)

134. Should be noted, that the expert mentioned above who was helping her, indicates that after working seven years on the same shift, and being able to coordinate that with his firefighter job in Sharon, without warning or reason, he was changed to a different shift away from the plaintiff's shift, which does not work with his city of Sharon schedule, and he has not worked a single day in a month.

It was obvious, that his helping her was angering someone in control.

Tom Bulisco is an assistant chief, and his son Marco Bulisco is the union president .

Parenthetically, at a later time, Marco Bulisco will threaten the Sharon Lieutenant to accidentally run him and his twin babies over with the fire truck at some time in the future.

Parenthetically, he (the Sharon Pa Lieutenant) has never been called back to work for New Castle since.

135. Plaintiff believes and therefore avers, his shift was changed because he was helping her.

136. Plaintiff believes and therefore avers if it turns out that someone has a complaint about her performance, she has never been told anything about it, and therefore never been able to correct it, for probably improper purposes so they would have an excuse to write her up.

137. She has never received negative performance ratings.

138. Anytime she's ever been told anything which have only been minor she has always corrected it.

139. **The City Administrative Code calls for ongoing education, and this is another violation. (SEE EX E)**

140. Recently the chief asked her how she was doing, and she replied that she would like to ask him that same question, and he indicated she was doing fine.

III. (THIRD) ATTEMPT TO HAVE HER QUIT, OR FATHER GO TO COURT TO HIDE THEM

MB GETS DESPERATE LOOSES IT - THE BIG OUTING OF MARCO BULISCO:

141. When it was approximately 30 days beyond her 90 days, **plaintiff's**

mother investigated with the national union and they indicate the following:

- A. It has been verified that the prevailing bylaws of this local union (as of the mentioned date and at the time of the plaintiff's hiring) stipulated a 90-day probationary period.
- B. Furthermore, it is affirmed that the plaintiff was indeed eligible for acceptance into the union at that juncture.
- C. Additionally, the national union clarified that while a local union has the authority to establish its own probationary period, any alteration to this rule would necessitate approval from the national level.
- D. As of the indicated time, it has been confirmed that there had been no formal request for such a change.
- E. The national union has provided guidance suggesting that the plaintiff communicate her desire for membership consideration to the Local President via email, with the aim of being included in the agenda of the next regular membership meeting of the Local, as advised by Andrew K. Pantelis, District Vice President.

142. She was hesitant to request a change in rules that might affect her eligibility and potentially subject her to accusations of negligence for not inquiring earlier.

143. However, she also aimed to avoid any potential conflict or reprimand, seeking guidance through her mother, who advised her to simply request membership.

144. The plaintiff found herself navigating a highly stressful situation, prompting her to bring all these concerns to her attorney's attention on that particular Friday. Her attorney assured her he would informally inquire with the chief on the following Monday.

145. On the Saturday between those two days, while the plaintiff was on duty, a notice appeared on the bulletin board announcing proposed changes to the relevant sections of the bylaws:

ARTICLE 2 OBJECTS

"Section 1: the object of this union shall be the fostering and encouraging of a higher degree of skill and efficiency,..."

Six

___ Commonly known that there has always been a tension between the city and the union on hiring.

As previously indicated, control in hiring can be very lucrative.

Parenthetically, although the plaintiff will bring all of this to the attention of the city, including a complaint that was never legally investigated, or legally concluded, it appears obvious that a choice was made to cave in to the Buliscos, who control the union rather than do the right thing and protect New Castle's first female firefighter.

Parenthetically, considering the control and manipulation they wield over the civil service and City Council, if they eliminate her and use that control, it'll likely be at least another 150 years before there would be a female applicant, much less firefighter.

146. The plaintiff contends that this constitutes a significant violation of civil service law, the New Castle Administrative Code, and the laws of the Commonwealth of Pennsylvania.

147. All national union literature, including standard bylaws, predicate union membership solely on moral fitness and similar criteria, deliberately avoiding any form of evaluative assessment.
148. As per legal statutes, municipal ordinances, and the terms of the collective bargaining agreement, evaluations and fitness determinations fall under the purview of the City, not the union.
149. The plaintiff maintains that these actions by certain individuals represent an improper power grab and simultaneously serve as a contrived pretext to withhold support for the plaintiff's union membership, thereby masking their underlying agenda of discrimination based on gender and disability.
150. Additionally:

ARTICLE 4: MEMBERSHIP

"Section 1: any appointed member of good character and sound mind shall be a member of this organization after one hundred eighty days (180) of employment in the fire department, by completion of the application and dues deduction check off slip. All applications shall be turned in to the recording secretary for approval of the membership, and voted in by plurality at the regular meeting.

151. Again, this is a major change doubling the 90 day probation period.
152. The bulletin board also stated:

"The Constitution and bylaws have been reviewed by the IAFF legal team and the proposed changes must be voted on. They will hang in each station until the March meeting. *If you have any questions or concerns with the updates, please contact me*
-MB (Marco Bullisco)

UNION MEETING MARCH 6, CENTRAL 7 PM

"If you have any questions or concerns with the updates, please contact me"
-MB (Marco Bullisco)

UNION MEETING MARCH 6, CENTRAL 7 PM

(SEE EX F)

153. Despite the plaintiff's desire to proceed cautiously and seek guidance to avoid any allegations of instigating trouble, repeated attempts to communicate with her attorney about this matter were unsuccessful.
154. This revelation unfolded on the plaintiff's first day back at work after a break, with the notice posted on a Saturday and a meeting slated for the following Wednesday.
155. After careful consideration, **prayer**, and deliberation over the weekend, the plaintiff ultimately opted to heed the instructions provided by the union vice president and those displayed on the bulletin board.
156. She sent the following **text** to MB (son of the subject, Assistant Chief) later on Sunday evening, wanting to make sure no one thought she wasn't following instructions or in any way waiving her membership request.
157. She was forced to communicate this to him as soon as possible, give him plenty of time to prepare for the Wednesday meeting.
158. She did this as soon as she was made aware and is appropriately and courteously as possible.
159. She did not want someone to think that she didn't care enough to "even" ask to be in the union. She also wanted to follow the advice she had been given by the national Vice President.

ANNIE TEXT REQUESTING UNION APPLICATION

"I am respectfully requesting I be provided with the Local 160 paperwork and requisite fee necessary to join the IAFF. As you know, I am well beyond the current IAFF/local 160 90-day work requirement with the NCFD. Additionally, union dues have been

deducted from my pay since my first paycheck. This has been done even though no one from the union has provided any paperwork nor any information contrary to what I was told on different occasions relative to my eligibility to request membership after 90 days. I reached my 90th day at the end of January.

I understand there is an upcoming monthly meeting. I am ready to submit the initiation fee and can make my own application letter, which I desire to do, especially since learning of said meeting to be held Wednesday March 6, 2024 at 7PM."

I thank you for your anticipated attention and response to this request.

(I am texting as I do not have your email).

This is Annie Papa

160. **Within minutes** she received this response from MB: MB Response 3
Minutes Later

Union dues haven't been deducted from your pay. You're paying \$10 a pay for station supplies only, which was explained to you when you filled out your voluntary deduction form. Our bylaws were submitted to the international for legal review and are up to be voted on at the upcoming meeting, which include a longer work requirement, as the city has increased the probationary period from 500 hours to 1 year. If the body so chooses, they can initiate you under the prior terms at Wednesday meeting. –

161. It must be noted that although the combination of his father and his presidency of the union allows him significant powers of manipulation over the rest of the firefighters, Marco had no material rank over the plaintiff.

162. In fact, the plaintiff possesses the very prestigious state certification **FIREFIGHTER ONE** and Marco does not.

163. Additionally, **plaintiff is an EMT**, and **Marco is only an EMR**.

164. It is common knowledge that once upon a time, the Fire Chief had proposed requesting all of the firefighters get **FIREFIGHTER ONE**

CERTIFICATION and it was rejected by the union and the rest of the firefighters. It is believed that only half of the fire department possesses that certificate.

165. Notwithstanding, that next morning **Monday 3/4/24**, plaintiff mother had received word from plaintiff's (other legal) counsel, indicating that in conversation with the chief, and to union rep (plaintiff assumes MB) and no one need interfere, not cause a problem, and believe him firmly that the union will approve plaintiff, but at a time and in the way they want it to happen, we could cause a problem if we keep persisting.

166. Going overboard to prevent anyone from claiming plaintiff's parents, including her lawyer father, would not interfere, a separate independent counsel was hired for the plaintiff.

167. That counsel and only that counsel was (at that time) working and trying to trust that the city would handle this appropriately internally.

168. He indicated and underscored that we should trust him, he knows what he's doing, and he had word from both of the important people.

169. Plaintiff did as instructed.

170. Plaintiff ***trusted the city*** and did nothing further.

MARCO BULISCO ILLEGAL, HOSTILE, THREATENING, PROMISED VENGEANCE - TIRADE TURNING THE DEPARTMENT AGAINST HER

171. Thereafter, the very next day. Plaintiff went to work, ***MB was waiting for her*** in the garage and ***angrily ordered her over immediately.***

172. As always, she was loaded down with all kinds of things she takes with her to work.

173. The conversation was very aggressive, in front of witnesses, and he went through what he claimed was a litany of reasons of incessant bad behavior which turned out to be only two reasons: (1) how dare her text him at 11 o'clock on a Sunday, and (2) accuse him of stealing union money.
174. As described, she has not been incessant or caused any problems.
175. In fact, she has shown the greatest restraint in light of the circumstances.
176. As for the text based upon when she found the information out, she was merely following his instructions to contact him if she had any questions.
177. And she never accused him of stealing anything.
178. He went on to indicate to her, that he had distributed her text to likely everyone in the fire department, which clearly indicated his goal to isolate and shun her.
179. He clearly indicated that everyone is "pissed off", will not talk to her, and likely have nothing to do with her.
180. Although he indicates that he forwarded her text, plaintiff believes and therefore avers, he likely sent another text claiming that she accused him of stealing, or some other fabricated reason aimed at isolating her.
181. He also indicated why that would be a good idea to isolate her, and indicated to her that she needs to get votes if she ever wants to get in the union, demonstrating his power.
182. The whole conversation had no positive side to it, including him breaking it off by telling her not to speak to him, and likely anyone else, and just go ahead and sue them instead.

183. This is another narrative he keeps pushing, to try to isolate her claiming that she wants to sue him.
184. He was literally taunting her into suing him.
185. Additionally, the conversation yielded a litany history of reasons why he doesn't like her father, untruthfully claiming her father is interfering, indicated that it's her who doesn't talk to him.
186. She listened quietly and respectfully, and only said one thing after she heard him out (approximately nine minutes), may I say something...
187. He did permit it and she explained what she meant by the dues comment and it had nothing to do with accusing him or anybody. She clearly proved her point but he ignored it.

**SEE MY CONTEMPORANEOUS INTERVIEW OF PLAINTIFF - WRITTEN
RECOLLECTION OF WHAT SHE REMEMBERED (EX G)**

"MB TIRADE" WITH WITNESSES PUBLIC BERATING

188. MB attempts to set the stage for plaintiff not being admitted into the union because of his easy to prove, untruthful claims during the tirade's:
- a. Incessant interference by her father, this is not true. He cannot cite any instances but even if it were true has nothing to do with her.
 - b. That her text was written by her lawyer father, trying to lay legal traps, as he was warned by Brad Schaefer and Neshannock fire department. This is clearly untrue, and clearly connects this project to the root of the defamation, and how both of these groups are working against her.
 - c. She was told by the Fire Chief on numerous occasions that 90 days, she would be eligible for the union and they would bring her paperwork or something to that effect.
 - d. She didn't even ask anyone at the 90 day mark, and after 30 more days beyond that and having heard nothing, she saw bylaws posted on a bulletin board claiming that they were changing to 180 days, within two days of that posting and inviting any questions to be sent to or communicated with MB.
 - e. Her mother investigated with the union, and confirm that when plaintiff was hired and when she started, it was 90 days.

- f. Seeing the posting that they were changing it to 180 days, ex post facto, and that if anyone had any questions, they should bring them to MB attention, she composed her own text very respectfully, and sent it, within the time constraints she was stuck with.
- g. Her mother's investigation revealed that she should ask how she could join the union.
- h. She reasonably feared that if she didn't ask that it might look like she wasn't interested.
- i. She composed that text herself and resisted any suggestions.
- j. That entire browbeating was a disguise of harassment, and was not even correct, anyway.

189. Following strict discipline, military decorum, as always, yes sir, no sir, may I say something, and not making any excuses through a great deal of stress, she courageously went about the rest of her job noticing a continuation of dwindling interactions between her and the rest of the fire company.

190. Even the people that like her are likely afraid to be associated with her. That's why these tirades are in public.

191. The reasons are contrived so as not to demonstrate to the rest of the firefighters how harsh and bullying they are.

192. By having a contrived excuse they want to look like the victim.

During discovery and litigation, we will likely find out for the first time what and how Marco poisoned his many members of the department as he could against her.

Frustrated that she hadn't quit yet, it would be very important now to consolidate his followers and intensify the harassment to make her quit.

193. Summoning courage even her parents didn't think she had, she went on to not complain or whine, work and did a good job that day.

194. Parenthetically, apparently thereafter there was training... of the new hires... which was put on Facebook once again welcoming them, and never mentioning her.

195. Likely to believe that they have never mentioned her in the Facebook because it is their intent and always has been to rid her as soon as possible.
196. Parenthetically, apparently the past, Wednesday, March 6, 2024 came and went, and as of this writing she doesn't know what happened at the meeting if anything concerning her, or the bylaws. Notwithstanding her text, she doesn't know if the bylaws issue was ever brought up, voted up or down, etc. she was always reasonably afraid to ask anybody.
197. Additionally, it should be noted that, before that meeting, she had observed some type of communication from MB, making fun of and mocking her on her attempt for the swift water class. **(SEE EX H)**
198. **The plaintiff is a gifted, well-respected career lifeguard having saved many lives in her career.**
199. **The exhibit clearly shows the mocking, from MB, which in addition to the mocking, is shocking because he would not have been able to get that information unless he had unauthorized access to her personal file.**
NEXT, MONTHS LATE PLAINTIFF WAS FINALLY GIVEN HER COPY OF SOP (NOT WHEN SHE STARTED MONTHS AGO AS REQUIRED BY LAW)
200. **The subject then came up from her that she has never been given any copy of SOP (*her rights including no harassment, discrimination on gender, discrimination on disability, etc.*)**
201. In reviewing the **SOP provided for the first time on April 4, 2024** in relevant part they demonstrate the City does almost none of them:

- a. Section 6.11.2 discusses pagers, it is obviously part of required minimal standard equipment for the safety of the firefighter.
- b. 1. Chain of command: 1. Lieutenants are third in command, and responsible for the *well-being of firefighters* under their command. From this we have deduced that that would be part of the chain of command or person you can ask questions of.
- c. 2. General procedures:
 - 1. City of New Castle fire department does not condone any form of discrimination with regard to sex, disability, etc.
 - 2. D. Responding in turnout gear. (SEE Ordinance SOP)
 - 3. E. 7 Daily Training. There is no training after field training, that is why Plaintiff was looking for classes.
- d. 3. Response guidelines
 - A. Communications are a vital part of firefighter service.
All personnel will be trained in the proper use... And the departmental communication protocols. It is the responsibility of each firefighter to utilize these guidelines to ensure proper communications compliant with policy. (pager).
- e. Chapter 4
 - 1. 4.10 Training

The City of New Castle was committed to continuing training for all employees. If an employee feels that additional training is needed, he/she is responsible for notifying his/her department head. Expenses incurred in on-the-job training should be assumed by the City.
 - 2. 4.11 Performance Evaluations

Unless otherwise addressed or provided by contractor of collective bargaining, all employees will participate in performance review session at least annually with their supervisor. This review is intended to provide support for the individual; to improve the performance of the individual by providing meaningful constructive feedback on the adequacy of performance; and to assist in the development and fulfillment of professional growth goals and job responsibilities.

Formal and documented reviews, as well as casual and undocumented discussions with your supervisor, will be part of your performance evaluation. To the extent practicable evaluations will be based on the direct supervisors direct observations of each employee's performance, the quality and quantity of each employee performance, and any additional efforts undertaken by the employee.

Your signature on formal review forms will serve as notice that the review has taken place and not whether you agree or disagree with the contents. Completed formal evaluation forms will be placed in the employee's personnel file. Please note that a performance evaluation does not necessarily mean a salary adjustment.

202. Plaintiff has **never been given a bad review** if there was one she was required to be given by civil service and city law, the chief or any other supervisor. The Chief always gave “good” reviews. The one that counts. **(SEE EX E)**

203. **Additionally, outside of field training, there had been no training, and that is why plaintiff was looking for more training and she not only did not do anything wrong, she did as was required of her in the SOP. It was likely at that, time, and still is, that if this is pursued properly, there may be one or two others involved.**

IV. (FOURTH) PHYSICAL ABUSE & SINGLING OUT ESCALATED ATTEMPT TO HAVE HER QUIT:

PHYSICAL ABUSE HUMILIATION SINGLING OUT.

204. Additionally, plaintiff was always advised that she was free to do any physical conditioning outside of the department, and she had arranged a very expensive training program which could be approved by her family physician.

205. When it became obvious to them that she was not going to quit, the harassment intensified and took on a physical form as follows;

- A. Even though she did not have workout clothes with her, and instead, pants and boots while traveling in one of the vehicles with Mr. Huddy and Antonio, she overheard them discussing a physical workout, and one of them indicating it was “not optional”.
- B. The workout consisted of her competing with one of the brand-new, very physically fit, smaller, athletic firefighters.

- C. They were to compete in a "SPRINT" of approximately 35 to 40 yards and when they reached the end of each sprint, they were to do a push-up.
- D. Each and every one of the 15 Sprints was to add a push-up so that on the last of the 15 sprints they would have done 15 push-ups.
- E. She obviously could not keep up with her competitor and on top of that, notwithstanding the fact that she was doing push-ups as taught by a professional, she was criticized on the manner of her push-up which certainly would have physical complications different than the firefighter she was competing with at the time.
- F. At one point in time, one of the two firefighters said..." Maybe you don't belong here:::" in front of the other less senior firefighter.
- G. They left to go do more training on a different area of the ground flipping a large tire and even though she wasn't required, she composed herself and asked if she could participate with them.
- H. They permitted it and she finished the entire workout.

206. It is likely that they were frustrated because she still did not quit.

207. Finally, as indicated in this document above, the bigger and most important purpose of MB is to prevent the plaintiff from being accepted by the rest of the group.

208. In addition to the isolation, misery, attempt to have her quit, a more sinister goal is to somehow present the idea that she just doesn't get along and for that reason, and she could not remain a member of the fire department.

209. This has been fostered on an ongoing basis from the first day the plaintiff walked into the fire department.
210. **Even more sinister, is the self-admitted, self-fulfilling prophecy of MB, wherein he alleges in the 11th hour, during his tirade to the plaintiff that she can't be a member of the collective bargaining unit (union) unless she is voted on.**

V. (FIFTH) SHAMING, RIDICULE, ISOLATING ATTEMPT TO HAVE HER QUIT:

NEXT: MARCO – BIG SHOT PUBLIC/EXECUTION OF PLAINTIFF

211. He further indicated to her that on Thursday, April 18, 2024, there would be a meeting of the union, and apparently her application would be offered to be voted upon.
212. Plaintiff, an eternal optimist, supported by her eternal optimist father, was excited and thought maybe the long “hazing” or whatever may be ending, everyone would vote her in, shake hands and she would finally become part of the family she always wanted to become part of.
213. He further indicated that she could attend.
214. The mayor very cordially indicated to him that this is/was a **good development**, because he just had a meeting of department heads a day or so ago, and the **Fire Chief (again) indicated that every one of the new hires are doing well** and satisfactory, including her..
215. He indicated that included the plaintiff.
216. It should be noted that this will be the second time the mayor was informed by the chief that Annie was doing very well.

217. Ninety days ago, he (the chief) said the same thing also volunteering that she is one of us now.
218. Eventually, the night of the union meeting came up, and as directed, plaintiff showed up at the fire station to attend.
219. It is likely that this was all staged by MB, his father, and any associates and in this file we refer to this incident as ***“the public/peer humiliation, punishment, incident”***.

GRAND HUMILIATION SCENE ISOLATION/EXECUTION OF PLAINTIFF

220. **“The Public/Peer Humiliation, Punishment, Incident”**, is given that name because it was designed to humiliate, embarrass, drive a wedge between plaintiff and her crew, and otherwise teach anyone else, what happens to lose (or in this case never get) favor with MB and his father.
221. Upon arrival she was informed that she would ***not be permitted to go inside*** and so she occupied herself in the fire station while the meeting apparently took place in the lounge room.
222. After approximately 30 to 45 minutes, a firefighter exited the meeting room and invited her to come inside.
223. The meeting room was the lounge area and approximately 13 people receded (everyone from her shift), no one gave her instructions about sitting, approaching or anything else, and so she IN her own words indicates “I didn’t stand at military attention, but out of respect, I did stand at parade, at ease attention, with my head up.

224. She indicates that her heart seemed to be racing, as she believed she was going to be voted in not having any other reason to believe otherwise, and that finally everyone would approach her and become her friend.
225. Instead, while standing that way, and there in front of all of her peers, MB indicated that there is a motion to reject her, and that it passed unanimously.
226. Mustering every amount of courage and composure she could, she said okay, and asked should I leave, or do you need anything else; she was instructed to leave because she was not a member.
227. MB gave her back her \$10, and application, said nothing and she left as instructed.
228. If true ***a motion was made to reject her***, and it was ***voted unanimously to reject*** her.
229. Conclusively proves everything MB threatened, its affect, and its cause.
230. Obviously this was another heartfelt emotional rejection for the plaintiff designed to take its emotional toll.
231. MB surely would have known what the vote was going to be before it was ever taken, and it is believed likely manipulated the same.
232. Shortly he could have spared her some of that emotional trauma, but chose not to by design.
233. MB did not nor did anyone else inform her what the consequences of that meant or whether she could reapply or give her any further instructions whatsoever.

234. Plaintiff believes that those attending that meeting were approximately 13 people, including ***all of the people from her shift***, one person from shift one.
235. This is an especially critical fact, because in the past before MB poisoning the well, people in her shift liked her.
236. ***This is especially critical for her upcoming new shift, because she would be staying over 24 hours, with people who were part of the unanimous rejection motion, with people who will or may not “have her back” at a motor vehicle, overdose, infectious disease call, or fire.***
237. MB violated the national oath of office and various other IAFF provisions in these actions and the **Code of Fire Fighter Ethics, (SEE EX I)** as described in this document as follows:

“I pledge my honor to perform the duties of my office in compliance with the Constitution and bylaws of the International Association of Firefighters and this local.
I will dutifully abide by and promote the positions taken by a majority.
I will dedicate my talents and energies to represent the mandates and directives of this union. I will use my good office to promote unity and harmony - all of which I solemnly promise and swear to keep to the best of my ability.

IAFF ARTICLE 3 MEMBERSHIP

Section 1. Active

Any person of good moral character, who at the time of making application is engaged in service within the jurisdiction of this Association, as set forth in Article 2 of this Constitution and bylaws will be eligible for active membership in this Association, through its chartered locals, state or provincial associations and joint councils.

Anyone eligible for membership in this local shall not be refused membership or upon acceptance, be discriminated against because of race, color, creed, national origin, gender, sexual orientation, or by reason of disability.

(SEE NATIONAL UNION HANDBOOK)

238. The Plaintiff contends and thus alleges that it is plausible that MB's father, being the proud inaugural responder and assistant chief, acted as the catalyst for dissent by emphatically declaring, "I vote no," thereby prompting unanimous concurrence from others.

239. From this point on her crew had been won over by MB and were not only shunning her, but not speaking to her while they were on calls, and on one incident not letting her carry the medical bag.

240. Additionally, at or about the same time MB was obviously able to organize a small group of firefighters to, allege that there were incidents against her handling herself at one or two fires while she was still at work.

241. They extensively interviewed her, and she clearly rebutted those instances.

242. Parenthetically, on one occasion she clearly and boldly went into a fire with a season firefighter who will testify to that.

243. This was an obvious attempt by these firefighters, sensing that something was coming from her to try to spin it against her.

244. She was interviewed in these "retaliatory alleged instances" were never taken seriously or heard of again.

245. She clearly disposed of them with a very thorough investigation as being untrue.

Stopped here

CRISIS: WHAT TO DO NOW WITHOUT ALIENATING THE COUNCIL,

ADMINISTRATOR, SOLICITOR, GOOD FIREFIGHTERS

246. Although, recognizing all of this was not only inhumane, and illegal, if there is any chance of salvaging her lifelong dream and career, she wanted to avoid any type of official action against the Buliscos and a handful of their followers.

247. It was spinning out of control.

248. She did not want to quit, because this has been her dream and knowing that's what "they" wanted her to do.

249. Although she is very proud, and very brave, I will never forget the chilly, early, spring morning where I saw her and her mother intensely hugging in our driveway and shuttering from the stress.

250. This was especially troubling to me sitting on the sidelines.

251. A part of me also recognizes that going to court would be another way of playing into their hands.

252. They would merely claim that she and her father were lawsuit happy, they would know enough about lawsuits to know that it would take months if not years, and all of the city would be forced to circle the wagons around them and the bad guys could hide accomplishing their ill deed.

253. We had prepared and presented a proper, very narrowly drawn, minor, limited, ADA request requesting only a change to a different shift and educating the necessary firefighters. (EX J)

254. it is urged herein that, contemporaneous with the ADA request, father of plaintiff had the doctor available in the City of New Castle to personally be interviewed by the city solicitor or city manager, and no one accepted that

offer, thereafter, the doctor had accompanied the ADA request with his medical endorsement, thereafter, the city requested of the doctor answers to interrogatories; all aimed at “the ability to perform the functions of the job”, and the doctor on every occasion, without exception assured that the accommodation was minor, and had nothing to do with the essential functions of the job which she could do.

255. The city not only granted the ADA request, but sent correspondence (JULY 15, 2024) that they wanted to promptly have a meeting with plaintiff and her new crew, ...*“Our goal is to ensure a smooth return for you and for the department.”* (EX K) **HOPED THAT: CRISIS SOLVED FOR NOW**

256. **At that point in time, the plaintiff had only missed approximately 60 days work.**

257. **It must be reiterated again, that the city refused to let her go back to work, clear through the present.**

258. **At about this time, in obvious and apparent retaliation, the defendants, and not the city attempted to bring some type of allegations against the plaintiff’s performance for the first time.**

259. **This was an obvious retaliation, and although the city was going to also investigate those allegations against the plaintiff, they were promising to investigate the allegations of the plaintiff against the the improper firefighters.**

260. **Parenthetically, although we did not want to cause a problem for obvious reasons, anytime they were interviewing the plaintiff, she never**

had a witness on her behalf, her mother wasn't permitted, and no one was permitted to record,

261. These alleged allegations were clearly not material, or trustworthy.

262. *(Parenthetically, it should be noted that these allegations will come up again almost ¾ of a year later, out of nowhere.)*

263. *Plaintiff anxiously awaited the smooth return to work meeting, but to this very day, (449 days later), it has never taken place.*

264. On October 6, 2025, in motion court the city solicitor will for the first time indicate to the plaintiff's counsel that the relationship can't be restored, and that he concluded his investigation on her claims months ago?

265. *Any request for her to take a test forward ADA issues is obviously only designed to terminate her, and disingenuous to be represented in any other way as they have been.*

266. We had also prepared a complaint on the harassment, because the SOP requires prompt reporting, and she wanted to try to make sure this would never happen to anyone else.

267. At that time, *Litigation Wise*, we still had a courthouse file open (10697 of 23 CA) from the numerous civil service complaints we had to file mentioned early in this document.

268. At that point I attempted to delicately and diplomatically "thread the needle" and **ADVANCE NOTICE ONLY** a motion for presentation at that case number describing the situation inasmuch a sanitized way as possible.

269. My goal was to keep this thing from coming apart and possibly playing their hands.

270. I distinctly remember showing up for motion court and requesting that we meet in the jury room without a formal presentation of the motion.

271. An agreement was struck between both counsel in courtroom number two jury room on that very day.

272. The city of its own volition through the solicitor, kept telling her not to report, and eventually excused her, but kept paying her benefits and paycheck.

273. At no time did the plaintiff ever request paid leave with benefits.

274. It is respectfully submitted that that was granted to mitigate their damages because they had to.

275. **Any move to cut off her benefits and pay would be devastating, because she is doctoring, and counseling with multiple professionals, as a result of her treatment before and after the ADA GRANT has been ignored.**

276. The City promised that if we ***withdrew and dismissed that action 10697 of 23 CA as an open file*** that they would promptly, appropriately, and thoroughly deal with all of the issues in the ADA request, and the harassment complaint.

277. Again, we ***TRUSTED*** the City Solicitor and in particular the city solicitor.

278. Parenthetically, although the only persons, who knew that we went to motion court at this time, by design, the plaintiff to preserve the relationship with her and the firefighters, (the judge, the solicitor, and plaintiff's counsel),

within hours of being in Motion Ct., Marco' attorney sent a threatening letter. (SEE EX L) . Another suggestion that the solicitor had a bias is available in a photograph taken at a political fundraiser by MB, in September, 2025 (SEE EX M)

279. Parenthetically, I have always struggled with the fact that I received a that threatening letter from another attorney on behalf of MB at that same identical time, within hours.

280. I was very careful that no one knew that I was going to court or went to court, and the only possible way that other attorney could have known, was if he had received word from the only other person who knew, and that would be the city solicitor.

281. Her mother had significant experience with her considering her brilliance in school and college, as sometimes flying in the face of her being understood for her social awkwardness.

282. The thought was maybe if her firefighter associates became aware of some of her minor quirks, they may not "fall for" MB false narratives and rumors and instead recognize that she could be a valuable member of the team. (She is very much like the TV show character "Sheldon" in Big Bang Theory)

283. But there was now a problem, because MB had turned her crew against her.

284. Consulting the SOP, and various ordinances, it seemed that the best way to accomplish everything would be to ask for an ADA request, primarily to

change her crew, and take an opportunity to educate her firefighters so that we could save the relationship.

285. At a great deal of expense and time and effort, we connected her with a doctor who had worked with her father in the past and present and was very much aware of her enthusiasm for being a firefighter.

286. She additionally hired a professional ADA advocate who knows how to work with fire departments.

287. It should be noted that the ADA request clearly indicated she could do the job and maybe the disability would help her do it even better, with attached research.

288. It must also be noted that although her doctor was in New Castle on that very day and offered to be interviewed or meet with the city administrator or city solicitor, neither of them accepted that offer.

289. It must be noted that her ADA request had an accompanying letter from the doctor, assuring of her ability to do the necessary functions of the job.

290. Parenthetically, upon request by the city, for more information from her doctor on whether she could do the job, he satisfied that very thoroughly and extensively, and they accepted that.

291. This would be the second time that she had unrebutted expert medical testimony that she could do the necessary functions of the job, and it was a minor question that had nothing to do with that at any time.

292. It should be noted that at no time did anyone, including her parents, her advocate, her doctor, or anyone else ever doubt in any way that she could perform the essential functions of the job.

293. After all, by that time she had done just that.

294. She had passed all the civil service tests, physical and written. She had passed field training from the assistant chief himself, and she had successfully done the job for several months as verified by the chief himself.

295. Parenthetically, her father did caution her mother that if these people are bad, designing people, they may attempt at some point to use the accommodation disingenuously, dishonestly, and illegally to try to claim she couldn't do the job.

296. We were pleasantly surprised when we received the written word from the City in **July 2024** that her limited very narrow ADA request was **GRANTED**.

297. The email that delivered the good news indicated that she was now on a new turn as requested and that they wanted to schedule a meeting for her to meet the assistant chief to assure a "SMOOTH" transition. **(SEE EX J and K)**

298. Any challenges today about whether or not she should take a test concerning whether she can do the job because of the ADA request, are clearly retaliatory, illegal, disingenuous and irrelevant, because her ADA request was granted over a year ago.

299. At about **that same time, in (July 2024,)** because after it was a designing person in addition to any issues, when asked by the city administrator and city solicitor what her goal was for the harassment complaint, although she

indicated she was not seeking vengeance or trouble for anyone, she did want to make sure that something this terrible never happen to anyone again in the fire department.

WE WILL LATER DISCOVER THAT CITY BECAME UNABLE OR
UNWILLING TO PROPERLY DEAL WITH THE HOSTILE WORK
ENVIRONMENT AND VIOLATE THE LAW TO PROTECT THE BULISCOS
AND/OR THEIR INABILITY

300. Everything changed in that July/August, 2024 timeframe.
301. August 2024, September, October, November, December, over 153 days, the smooth return to work meeting was not scheduled.
302. The smooth transition meeting was never scheduled, notwithstanding several polite, professional requests from the plaintiff's ADA advocate.

SPRING 2025

EVERYTHING CHANGED AS WE APPROACH AN ELECTION YEAR
BECAUSE THE CITY CAN'T OR WON'T DO WHAT IS RIGHT THEY CHOSE
TO CIRCLE THE WAGONS, AND RETALIATE (PICK ON HER), THE
WEAKER OF THE TWO COURSES OF ACTION:

303. January, 2025, at this point, the plaintiff has been off work, not permitted to return for well over a year, and the tenor of their letters make it very clear that they are now challenging the plaintiff to justify not returning her to work.
304. Notwithstanding, that their written position in July, 2025, six months before was to ... "assure a smooth return to work... nothing in their correspondence

even mentions that even though plaintiff and her ADA counselor had sent numerous written reminders.

305. Instead, startling the plaintiff, the city seems to have turned against the plaintiff, or at least no longer disguises that they always were, by trying to resurrect the ADA issue, which was already granted.

VI. (SIXTH) ATTEMPT –CITY OPENLY JOINS THEM “CIRCLES THE WAGONS”

TERMINATE HER BY RESURRECTING THE (ADA AGAIN) CLAIMING IT IS BECAUSE WE JUST FOUND SOMETHING WE FORGOT MONTHS AGO:

VII. (SEVENTH ATTEMPT) -TERMINATE HER BY PHONY RESURRECTING THE (ADA AGAIN) CITY JOINS THEM NOW ADA RETALIATION?

306. Even though it was outrageous for them to ask Doctor Taka to answer questions on this issue again, he did so at great time and expense, the plaintiff and her physician, and once again indicated she can do the functions of the job. (SEE EX N)

307. She responds in a very thought-provoking protest letter asking serious questions that will never be answered by the city.

308. The doctor responds and once again indicates she can do the essential functions of the job. (SEE EX N)

309. This will now be the fourth time they've asked him to make the call, and he did.

310. From the rest of the cities actions, it became obvious that he did not give them the answer they wanted. (SEE EX O)

VIII. (EIGHT) ATTEMPT TERMINATE HER BY SETTING UP A TEST NO ONE ELSE EVER HAD TAKE WITH NO CHANCE OF SUCCEEDING AND EVIDENCE NOW WHICH WE NEVER HAD BEFORE:

Although I am a professional attorney obviously dealing with one of the worst files I have ever dealt with in my life because it's my daughter, it's also one of the worst files I have ever had in my 38 years experience watching a small handful of people, taking the bow on Facebook, parades, public functions as... Brave first responders... While I know the lengths they are going to isolate, pick on, and now degrade the reputation of the first female firefighter in the City of New Castle.

311. Someday in court, I'm sure a skilled trial attorney will successfully object when I turn and look at the other client table and merely say... "Shame on You".

312. The next major thing that happened, just as I had feared and warned my wife, the City had the audacity to raise the ADA issue again, after granting the request months prior, as an obvious ploy to terminate the plaintiff.

313. Although, they also had the audacity to request her doctor clarify with a request for even more information, he indicated very clearly (for the fourth time now) that she could do the job. She could do the essential functions of the job.

314. As justification for this latest and third request, in a shocking display of retaliation, they attempt to resurrect the closed instances referred to from July, 2024.

315. Although they ridiculously claimed that they had just discovered further information, forgot they had discovered, later discovered information, or whatever, to attempt to justify the fact that we had never heard about this for over a year and ½, concerning the previously dismissed, alleged incidents, and although they would not interview her again, she provided expert firefighter analysis of the lack of any credibility on these allegations or incidents. **(SEE EXHIBIT P).**

316. Also, although they refused to even interview her, she provided a detailed rebuttal, which we believe disposed of the incidents issues again..

317. They chose to put that issue squarely on her doctor again, and even though he complied and cleared the way for them, they apparently chose not to accept that and instead try to find a way to terminate her legally.

318. At about the same time the city administrator sent a letter suggesting some type of test that she should take.

319. The plaintiff sent back a very reasonable and very detailed point by point challenge to the suggestion of a test or anything else. **(SEE EX N)**

320. Additionally, the doctor sent back information, clearly indicating that she has the ability to do the job.

321. It is very clear that no one has ever had to take a test like this in the past.

322. Chief Kobbe verified that on October 10, 2025.

323. The alleged incidents, desperately attempted to justify the obvious retaliation can be torn apart on cross-examination. None of the incidents are reported by the chief himself.
324. Meanwhile, plaintiff has never heard from the city on her 2.4 complaint for harassment, notwithstanding that the law is very clear that a complaint such as that must be followed by a very prompt investigation, prompt curing of the hostile environment work area, and a written report with findings delivered to the department head.
325. If you follow a timeline the smooth transition was supposed to occur in July 2024, she heard nothing, nothing in August, September, October, November, December, January, 2025, February, March, April, May, June, July, August, September, or ever after.
326. If you follow a timeline, a very serious, detailed 2.4 harassment complaint in April, 2024, she heard nothing. May, 2024, June, July, August, September, October, November, December, January, February, March, April, May, June, July, August, September, (519 days, one year and four months) she heard nothing on her harassment complaint.
327. One year and two months later, (425 days after the smooth transition was supposed to take place), she received orders to take a test to keep her job.
328. After hours, on October 2, 2025 Thursday night she received an email ordering her to appear at a test to test whether or not she should keep her job on October 10, 2025.
329. She showed up as ordered and immediately presented herself to the chief.

330. After being kept off her job for over a 1 year and ½, she was given **seven days advance notice**, including over a weekend to take a test: after she had been prevented from working; ever being in the station; having no equipment; no witness; no females; with no instructions; and merely following 3 strange men including one of the principal harassing firefighters going into an abandoned house **(EX S)**.

331. The city ordinances, common law, state and federal constitutions, civil service law, American with Disabilities Act, guarantees of non-discrimination, and our own ordinances found in the SOP recognizes :

Section 6.13 justifiably refer to acquisition of this position as “Civil Service employees and employees who by statute have a protected interest in their jobs...”,

(SEE EX T)

332. She has a hard earned, very valid, property interest in her civil service job, and she must be protected from this “ambush” sham of the test.

333. In addition to all the strictures of the Civil Service Commission, regarding testing like this, which we incorporate by reference and demand that she be given protection of, there are significant regulations on testing firefighters in Pennsylvania. **(SEE EX R)**.

334. Facing that emergency, she was forced to bring an action against the two perpetrators, and attempt to get relief in motion court on Monday morning October 6, 2025.

335. The plaintiff did not list the city or the fire department as a defendant on the new action to replace the one that was withdrawn with the agreement made a year before, to try to the last minute to save the relationship.

336. After motion court, and after the solicitor indicated she would get no relief unless she sued them, notwithstanding the suggestion of the judge. He refused to grant an extension of time to prepare.
337. During discussions with counsel for the city, he indicated at that time and date that the relationship can't be restored and saved now.
338. It is suggested, that is why they let so much time expire so they could use that argument to get support and City Council or in the court of public opinion.
339. He also indicated (for the first time) that the 2.4 investigation was over.
340. He made that declaration in the face of plaintiff's counsel's protesting a test because there has never been a proper closing of the investigation.
341. Simply stated, if you pass the test, she couldn't go back to work because they haven't cured the harassing environment.
342. Counsel for the plaintiff was startled to learn that the solicitor said the investigation was over.
343. Again, that is the first time he heard that.
344. That would be illegal because the ordinance requires written findings, and a report to the department head, which we would eventually have received.
345. He would grant an extension only if she agreed to say that the test was valid and it would be dispositive of her career.
346. This clearly indicates his lack of faith in his own test validity.
347. Although announcing to everyone that he would be adding the fire department as suggested by the city solicitor and returning to motion court on

FILED/ORIGINAL

2025 OCT 14 PM 3: 56

JODI KLABON-ESOLDO
PRO AND CLERK

Thursday, October 9, 2025, all of the pleadings were adjusted and the motion brought to be presented.

348. At motion court, plaintiff's counsel was shocked to discover that the city solicitor did not show for the motion.

349. Although he claims he did not get "proper" notice, it is respectfully submitted that most attorneys would have shown up at the very least to make that argument.

350. However, the court did allow him to participate by phone after the court waited several minutes to find him.

351. He indicated to the court that he did not get notice of the document.

352. In investigating in plaintiff's attorney's office is clear that was not correct, he did get notice on Tuesday before that Thursday.

353. During the conversation in motion court, although the second judge did not entertain a motion, he did request whether or not the city would agree to an extension, and the city once again refused, unless the test were agreed to be valid and dispositive. This was not accepted for obvious reasons.

354. The morning of October 10, 2025, the plaintiff dressed in uniform promptly reported for duty at the site as ordered to.

355. The plaintiff had no union or other witness.

356. There was a person alleged to be a retired Fire Chief from Mount Lebanon, and it looked like two other test monitors all of which were strangers.

357. It is reasonable to assume that the test was indeed a set up with three monitors, making sure that each of them could cite and not miss any infraction.

358. Additionally, if all of the other firefighters were required to take the test at least they would have a mean score, and it would be fair.

359. Parenthetically, it is estimated that less than half of the firefighters in New Castle are **FIREFIGHTER ONE CERTIFIED**. She took and successfully passed a course in Pittsburgh that took all day while she was working before they prevented her from going to work. **(SEE EX A)**

360. It is respectfully suggested that most, if not all, of them do not have the educational background she has.

361. It is obvious if not inescapable that this is retaliation to cover the Buliscos, based upon not wanting a female firefighter, and discriminating against her disability.

362. The only firefighter there beside the chief was _____, who had previously, falsely try to accuse the plaintiff of insubordination, and claimed that the plaintiff's father had previously tried to bribe the Fire Chief.

363. The plaintiff had no equipment or helmet.

364. Although her counsel was with her to assist her, and introduced himself, everyone appeared to walk away up a grassy slope, and apparently into the condemned structure.

365. During the introductions, counsel for the plaintiff informed the chief that she was dressed and ready for work, and ready to report for work, and he indicated that she would not be needing to work, because her crew, her new crew as a result of the ADA grant was not on that day.

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366. Counsel for the plaintiff informed the chief, that the test was illegal because it was a singling out, after the chief informed him that there had never been anyone else required to take such a test. **(SEE EX Q)**
367. We also indicated to the chief that we believe the test is illegal because the 2.4 complaint was never properly or legally handled.
368. Counsel for the plaintiff handed a new 2.4 complaint, based upon councils.
369. Without objection from the chief, plaintiff, at the orders of her attorney and her doctor left without taking the test, without objection, and with acknowledgment from the Fire Chief.

XIX. (NINETH) ATTEMPT-TERMINATE ILLEGALLY AND RUN OUT THE CLOCK?

370. It's now obvious that the city is either unwilling to attempt or unwilling or unable to investigate the harassment, cure the work environment which of necessity would be stopping this type of behavior from these people, and instead have decided to "circle the wagons" and defend the indefensible by claiming that it doesn't exist or ignoring it.
371. The unfortunate thing is that it is bigger than the injustice to the plaintiff.
372. In order for the principal defendants to "self preserve" they have to use all of their power contacts and influence, including the city administration and find some justification for terminating the plaintiff
373. By now. She has proven she is not going to quit.

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374. They have nothing that they can use as grounds to terminate her, and that's why they're trying to force the "set up" test.

375. She did not have to stake the set up test because it was illegal, and so they will take their chances now and terminate her

376. They believe that she can't sue without getting an EEOC "right to sue" letter, which will take at least six months.

377. They also know that once a complaint is filed, they can have as many as 12 to 18 more months in preliminary objections.

378. They know that the city has to be named the defendant, and so they will have plenty of free legal assistance to protect them individually.

379. They also know that she may quit somewhere along the line again.

380. If she doesn't, although they know they would have to pay handsomely there willing to take that chance because it's taxpayer money not their own.

381. There willing to do all of that as a "cost of doing business" knowing that they get to keep their jobs, and keep on polluting the hiring system.

382. They know that it is unlikely that any female will ever apply again, much less several years at least.

383. Bottom line, they win.

384. Bottom line, they had to change this lawsuit, and discredit her now also.

385. It's much bigger than keeping her from having her job, by discrediting her to save themselves, they ruin her career and reputation forever.

386. They will do anything to keep the truth from coming up, until it's no longer front-page news.

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Respectfully Submitted



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